

REMARKS

Reconsideration of the application in light of the following remarks is respectfully requested.

Claims 1-8 are pending. Claim 1 has been amended in an idiomatic nature, and sets forth the properties of the recited structure without narrowing the subject matter contained therein. No new matter has been added.

Claims 1-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Interactive Layout Mechanisms for Image Database Retrieval*, John MacCuish, et al., SPIE 104-115, vol. 2656, January 1996 (“MacCuish”) in view of U.S. Patent No. 6,219,053 to Tachibana et al. (“Tachibana”). Applicant respectfully traverses the rejection.

The Examiner contends that MacCuish discloses most of the features of claims 1-8. However, the Examiner acknowledges that MacCuish fails to disclose “the control means to select an arbitrary position on the display unit that upon selection displays or removes an icon related to a database element where its degree of dissimilarity to other icons corresponds with the distances between the icons,” and further fails to disclose “the mutual positioning of icons on the display in concurrence with the dissimilarity of the elements from the database.” (Detailed Action, item 4, page 2.) The Examiner cites Tachibana (column 2, lines 42-52, and column 1, lines 1-5, respectively) as disclosing those features acknowledged to be missing from MacCuish. The Examiner states that it would have been obvious to a person of ordinary skill in the art to combine MacCuish and Tachibana to achieve the invention of claims 1-8.

Applicants submit that Tachibana, column 2, lines 42-52, discloses an apparatus that draws icons corresponding to objects, where the correlation between objects is taken into account in computing the correlated positions of the icons. This passage describes in general terms the embodiment of Tachibana, Fig. 4, which is explained at column 6, line 23-45. Column 6 clearly discloses that the user interface displays elements at varying distances based on their correlation from a root element. Tachibana discloses displaying icons indicating hierarchical levels, where “the

CONCLUSION

Each and every point raised in the Final Office Action mailed January 4, 2005 has been addressed on the basis of the above amendments and remarks. In view of the foregoing it is believed that claims 1-8 are in condition for allowance and it is respectfully requested that the application be reconsidered and that all pending claims be allowed and the case passed to issue.

If there are any other issues remaining which the Examiner believes could be resolved through a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

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Respectfully submitted,

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